



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH
State Clearinghouse



Steven A. Nissen
DIRECTOR

October 31, 2001

Jim Austrang
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Subject: Tourelot Remediation/Cleanup Project
SCH#: 1999042079

Dear Jim Austrang:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 26, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

State Clearinghouse Data Base

SCH# 1999042079
Project Title Tourelot Remediation/Cleanup Project
Lead Agency Toxic Substances Control, Department of

Type EIR Draft EIR
Description The remediation involves the characterization, treatment, and removal of ordnance and explosives (OE) and chemically contaminated soil at the Project Site.

Lead Agency Contact

Name Jim Austreng
Agency Department of Toxic Substances Control
Phone 916 255-3702 **Fax**
email
Address 8800 Cal Center Drive
City Sacramento **State** CA **Zip** 95826-3200

Project Location

County Solano
City Benicia
Region
Cross Streets Rose Drive, East 2nd Street
Parcel No.

Township	24	Range	3N	Section	Base
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Proximity to:

Highways 790,680
Airports
Railways Union Pacific
Waterways
Schools Matthew Turner
Land Use The property is currently undeveloped open space, land use designations are open space and single family residential.

Project Issues Aesthetic/Visual; Air Quality; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Reclamation Board; San Francisco Bay Conservation and Development Commission; California Highway Patrol; Caltrans, District 4; Department of Conservation; Department of Health Services; Integrated Waste Management Board; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; State Lands Commission

Date Received 09/12/2001 **Start of Review** 09/12/2001 **End of Review** 10/26/2001

DEPARTMENT OF TRANSPORTATION

P.O. BOX 23600
OAKLAND, CA 94623-0600
(510) 286-4444
TDD (510) 286-4454

LETTER

H



September 25, 2001

SOL780-2.02
SOL780024
SCH# 1999042079

Mr. Jim Austreng
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Dear Mr. Austreng:

**TOURTELOT REMEDIATION/CLEANUP PROJECT - DRAFT ENVIRONMENTAL
IMPACT REPORT**

Thank you for including the California Department of Transportation in the environmental review process for the above-referenced project. We have reviewed the Draft Environmental Impact Study, dated September 2001, and we are satisfied that the proposed activities will not significantly impact the State highway system.

H-1

If you have any questions regarding this letter, please call Rick Kuo of my staff at (510) 286-5988.

Sincerely,

RANDELL H. IWASAKI
Acting District Director

By

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

cc: Katie Shulte Joung (State Clearinghouse)



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

LETTER

1

October 29, 2001

Programs and Project
Management Division

Mr. Jim Austreng, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Dear Mr. Austreng:

The U.S. Army Corps of Engineers has reviewed the Draft Remedial Action Plan and the Draft Environmental Impact Report for the Benicia Tourtelot Project Site. Comments from our review are enclosed.

If you have any questions, please call me at (916) 557-7906.

Sincerely,

Bruce Handel
Project Manager
HTRW Branch

Encl

MEMORANDUM FOR FUDS UNIT (Mr. Jerry Vincent)

SUBJECT: Review comments on the Remedial Action Plan, Tourtelot Cleanup Project, Benicia, California, dated September 2001.

1. Executive Summary. The executive summary does not provide a complete review of the investigations/actions performed and the responsible agency/organization conducting the activity. The executive summary provides a jumble of various activities completed without proper time sequence or responsible organization identification and likely does not identify all phases or activities completed. By omitting a complete review, it appears that all activities mentioned were conducted by the U. S. Army Corps of Engineers. It should be made very clear what activities were completed by the U. S. Army Corps of Engineers under the FUDS Program, and by Granite Management Corporation under the DTSC Order. | I-1
2. Section 1.1 and 1.2. Same comments as in No. 1 above. | I-2
3. Section 2.2. Figure 2-7. What is the basis for identifying the "existing open space with potential for OE"? This figure represents a different area identified in the Ordnance and Explosives Remedial Design Document and accompanying Explosives Safety Submittal for the OE Removal Action for the project site. It would seem that any and all areas that are being investigated and identified for OE removal actions should be identified in this figure. | I-3
4. Section 3.2. Same comment as in No. 1 above. | I-4
5. Section 3.2, pg. 3-2, line 34. It is unclear what purpose this sentence serves. In addition, what is the basis for this statement? It could also be stated that this is true for all areas outside of the project site/areas investigated to date. The sentence should be eliminated from the document. | I-5
6. Section 4.1, pg. 4-1, lines 21-34. This paragraph is very confusing in providing a clear definition of OE Scrap, and should be rewritten. | I-6

Bruce Handel
Project Manager
(916) 557-7906

29 October 2001

MEMORANDUM FOR CESPK-ED-PM (B. Handel)

SUBJECT: Review comments - Draft Remedial Action Plan, Tourtelot Cleanup Project,
Benicia, California, September 2001

REFERENCE:

- A. *Engineering Evaluation/Cost Analysis Action Memorandum Former Benicia Arsenal
Solano County California, March 2000.*

1. The subject RAP has been reviewed. The following comments are provided for your use.

Comment No.	Page	Section	Comment
1	5-9	5.4	<p>The following comment has been provided previously under the Administrative version of the subject document as well as the associated RI/FS Study:</p> <p>The proposed alternative, as presented in section 5.4 of the subject document, is not consistent with the recommendations provided by the USACE under Section 8.2 of reference A.</p> <p>Moreover, the actions described in the document indicate that the project site is being prepared for long-term residential development; the recommendations provided under reference (A) are designed to protect public health and safety if fully implemented.</p>

2. If you have any questions please contact me by phone at (916) 557-7451 or by e-mail at [jesparza@spk.usace.army.mil].

JOHN ESPARZA
Chief, Environmental Chemistry Section
Environmental Engineering

cc: Allen Curley, Edward Ketchum (USACE)

MEMORANDUM FOR BRAC-ER/IRP UNIT (Ms. Linda Finley-Miller)

SUBJECT: Review Comments on the Remedial Action Plan, Tourtelot Cleanup Project, Benecia, California

1. References

a. Remedial Action Plan, Tourtelot Cleanup Project, Benecia, California, prepared by EarthTech Corporation, dated Sept 2001.

b. Engineering Evaluation/Cost Analysis Action Memorandum, Former Benecial Arsenal Solano County, California, dated March 2000.

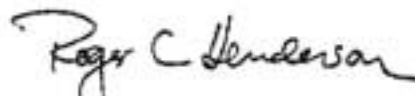
2. A review of the subject document has been completed. The following comments are provided for your use.

CMT #	Page	Line #	Comment	
1	ES-6	32	Use of non-detect as a cleanup level for PAHs is a very expensive decision. We have cleaned up PAHs elsewhere in the Bay Area for residential exposure scenarios and did not use non-detect. [REDACTED] [REDACTED] [REDACTED]	I-8
2	ES-6	34	Similar issue for mercury. Going to ambient levels is costly. Please clarify.	I-9
3	ES-7	24	Although use of the 500 mg/kg cleanup value for petroleum hydrocarbons based on the SF Bay Regional Water Quality Control Board's Taste and Odor Criteria makes sense for shallow soils (10' bgs or less) in residential areas, soils deeper than 10' bgs should not be cleaned up to this strict criteria. Justify why this is being proposed for soils at depth.	I-10
4	ES-8	34	You mention that soils might be treated on site to the PRGs then discharged on site. Do you have agreed upon discharge levels? If not, you may be required to treat your on-site soils to a lower level than your in-situ cleanup numbers. Clarify.	I-11
5	ES-8	19	You mention "Final Remedial Goals" (FRGs) here, but they are never mentioned or noted anywhere else. Are these different than what you are proposing? Clarify.	I-12
6	4-3	38	I'm not sure it is in the best interests of the Gov't to have you propose applying drinking water MCLs to groundwater that is clearly not going to be used as such. Clarify why this is being proposed?	I-13
7	4-5	10	Why were ambient levels of metals not used in your screening risk assessment? This would result in a higher risk (and thus need for remediation) than if they were taken into account? Clarify.	I-14
8	4-10	43	Again, your approach of cleaning up soils for heavy metals to ambient levels is a very expensive approach. Justification for this needs to be provided.	I-15

SUBJECT Review Comments on the Remedial Action Plan, Tourtelot Cleanup Project,
Berkeley, California

CMT #	Page	Line #	Comment	
9	4-11	20	Here and throughout this document, you refer to confirmation sampling which uses a "bright line" approach - that is, discrete samples will be individually compared to the cleanup goals to decide on further remediation. [REDACTED] A statistical confirmation sampling methodology needs to be proposed to be acceptable.	I-16
10	4-12	1	Was your intent of using a global ambient for dioxin/furan for site cleanup goals discussed with the USACE toxicologist? Did you not have local ambient data? Clarify.	I-17
11	4-12	5	See comment 3.	I-18
12	5-9	25	I'm not clear why Alternative 5A was selected. It results in a lot of off-site disposal of TNT contaminated soil that will result in a long-term liability [REDACTED]. Treatment options are usually preferred as part of the CERCLA alternative analysis process. Clarify.	I-19
13	Figures	--	Figures 2-3, 2-4 and 2-5 show the horizontal extent of "Impacted Soils". Does the use of the term "impacted" imply that these are soils above the cleanup levels? If so, then I could not find any soil samples on Figure 2-5 (petroleum impacted soils) which were over the 500 mg/kg cleanup level you have proposed. Please clarify.	I-20

3. Point of contact for this review is Roger Henderson, P.E., C/Environmental Engineering Section, US Army Corps of Engineers, Sacramento District, (916) 557-5378 or rhenderson@spk.usace.army.mil.


Roger Henderson, P.E.

MEMORANDUM FOR CESPK-ED-E (John Esparza)

SUBJECT: Review comments – *Draft Environmental Impact Report, Tourtelot Remediation/Cleanup Project, Benicia, California, September, 2001*, Prepared by Department of Toxic Substances Control.

1. I have reviewed the subject document as requested. The following comments are provided for your use.
2. General comments: Although the subject matter covered by the document was generally in-depth, overall the document failed to address the full scope of the project. It is obvious that the project only begins with the remediation efforts associated with the UXO cleanup. Instead, the actions described in the document indicate that the project site is being prepared for long-term residential development. Although UXO and HTRW cleanup are addressed in the project actions, the resculpting and recontouring of the terrain have little to do with UXO cleanup. The responsibility of UXO cleanup is to return the terrain to the contours and grading which existed prior to the undertaking of the cleanup actions. Under the Project Objectives section of the document (Section 3.1), the text states: "Remediate the areas of the Project Site that the Benicia General Plan designates for the residential or park use to a standard suitable to allow unrestricted use of residential lots and the park." Also, "In order to meet these project objectives, ... site remediation will consist of several coordinated activities:" (to include) "Areawide clearance in order to ensure clearance of areas ... that are planned for future residential use in the North Valley and South Valley and on the Ridge, and to provide 14 feet of clean crushed bedrock below final site grades in future residential areas ...". This is reiterated in the Proposed Project section of the Executive Summary.

I-21

The movement of soil is evidence of the greater scope of the project. In Table 3-4, On-Site Earth Moving Activities, approximately 218,000 cubic yards of soil are being moved in relation to the UXO/HTRW cleanup, while over 1,430,000 cubic yards of soil are being moved to prepare the site for the long-term development objectives. This is over six times the amount of dirt being moved. It is clear that these activities represent the greater efforts associated with the project, and thus, the true objectives of the project. To that end, the document fails to address the impacts associated with the long-term residential development.

I-22

Impacts associated with the project are generally described as either non-existent, short-term or reduced to less than significant, through mitigation measures. In virtually every scenario described in the Biological Resources section of the document (Section 7), the environmental impact has been kept at a minimal level because the impacted area is able to return to a state of natural equilibrium after being disturbed through project-related activities. In reality, this return to a state of natural equilibrium would never take place due to the anticipated residential development, or it would be short-lived. In fact, it is highly unlikely that any habitat, species, or area of environmental quality (air quality, water quality, noise, aesthetics, ...) will escape the long-term significant impacts as a result of the

I-23

residential development intended by the project. Those resources that are not directly impacted by the project actions and subsequent development (loss of habitat, diminished air quality, etc) will be indirectly impacted from the same. Cumulative impacts have not been considered or addressed in the document. The remaining wetland in the South Valley area will likely never see the return of most displaced species and will inevitably be irreparably damaged or destroyed as a result of human encroachment. The introduction of increased numbers of domesticated pets that are allowed to run free will stress the species that will not have already been driven out of their habitats.

I-23
Cont.

Although the document presents the project as remediation/cleanup, the preparation of the site for residential development is being hidden within the project. The document should either limit the scope of the project to only UXO/HTRW cleanup and remediation or it should fully address the known and intended future development of the site and the long-term and cumulative environmental impacts associated with that development.

I-24

Two sections of the document, Section 20, Growth Inducing Impacts, and Section 21, Cumulative Impacts, offer the opportunity to fully address these issues. In each case, the relationship to the residential development aspect of the overall project is acknowledged, however, it is only in passing and only enough to describe how this project will correct the situation (discovery of UXO/HTRW) that prevented the development begun under a previously approved project (Tourtelot Property Residential Development Project).

I-25

It is clear that the document describes two separate construction activities, the latter of which has no relationship to the remediation of the UXO/HTRW cleanup action. It should be addressed in a separate document that is directly related to the residential development of the site.

I-26

3. Specific comments follow:

No.	Section	Page	Comment/Note
1	6.3.2	6-6	Long-term air impacts should be considered due to the development of 416 residences.
2	6.3.2	6-7 & 6-8	Final sentence states that "Current data suggest that concentrations of these soil contaminants are not high enough to present a concern should they become airborne." Data should be referenced and quantified.
3	7.2.2.3	7-27	Text in first paragraph should include "However, the habitat exhibits a moderate probability of occurrence."

I-27

I-28

I-29

4	7.2.2.3	7-28	Text in third paragraph (California Newt) should include: "However, presence has been confirmed Regarding occurrence and habitat.	I-30
5	7.2.2.3	7-29	Northern Harrier. Add "therefore probability for occurrence is high" to last sentence.	I-31
6	7.2.2.3	7-31	Loggerhead Shrike. Add to end of second paragraph: "Presence has been confirmed based on occurrence and habitat."	I-32

4. If you have any questions please contact me by phone at (916) 557-6719 or by e-mail at [jsuazo@spk.usace.army.mil].

JOHN SUAZO
Environmental Analysis Section
Environmental Resources Branch
Planning Division